

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re Russell S. Parrish
Jay M. Parrish
Debtors

Case No. 19-31632-KLP

Chapter 13

Judge Kevin R. Huennekens

MOTION OF DEBTORS FOR EXTENSION
OF TIME TO FILE CHAPTER 13 PLAN AND SCHEDULES/STATEMENTS

NOTICE IS HEREBY GIVEN THAT ANY PARTY OBJECTING TO THE EXTENSION OF TIME REQUESTED HEREIN SHALL FILE WRITTEN OBJECTIONS WITH THE COURT WITHIN FIVE BUSINESS DAYS AFTER SERVICE OF THE MOTION BY THE DEBTOR

Come now Russell and Jay Parrish, the above-named debtors and debtors in possession, through counsel, and move this court pursuant to Fed R Bankr P 9006 for an order granting them an extension of time to file their Schedules, Statements and Chapter 13 plan as mandated by Fed R Bankr P 3015. The Petition Date in this case is March 27, 2019, and this Motion is timely made before the expiration of the date for filing their Schedules and Chapter 13 Plan. Further, the date for the first meeting of creditors in this case under 11 USC Section 341 has been set for May 16, 2019, at 9:00 am, a date after the date the schedules, statements and plan would be due if this motion were granted. As grounds for their Motion, the Debtors respectfully state that they are still gathering information for counsel in order to complete the schedules, statements and plan due to the fact that this case was filed the same day they first met with counsel due to possible tax lien issues.

Dated: 4/9/2019

Respectfully submitted,
Russell and Jay Parrish

By: /s/ Ellen P. Ray
Ellen P. Ray, Esq.
1701 W. Main Street
Richmond, VA 23220
(804) 355-1800
Va. St. Bar No. 32286
Counsel for Debtor

CERTIFICATE AND PROOF OF SERVICE

I certify that on the 26th day of July, 2016, I served a copy of the foregoing notice on the United States Trustee, 701 E. Broad Street, Rm 4304, Richmond, VA 23219 and Suzanne Wade, Trustee, PO Box 1780, Richmond, VA 23218-1780 as well as all creditors as listed on the matrix attached hereto.

/s/ Ellen P. Ray

Ellen P. Ray